

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MILAN HEGGS, ROY BECKFORD and)
PHILIP LEGREE, individually)
and on behalf of a class of)
all others similarly situated,)
DISABILITY RIGHTS NEW YORK)
and DISABLED IN ACTION,)
Plaintiffs,) 17-CV-03234 (RJD) (TAM)
-against-)
THE CITY OF NEW YORK, et al.,)
Defendants.)

DEPOSITION OF MILAN HEGGS

Via Videoconference

Monday, November 22, 2021

Reported by:
MARIANNE WITKOWSKI-SMITH
JOB NO. 201777

1 M. Heggs

2 A. I was in prison.

3 Q. What I'm trying to get at is -- so
4 you were in a car accident in 2019, correct?

5 A. No.

6 Q. What year was the car accident?

7 A. 2015.

8 Q. Oh, sorry, yes.

9 In 2015, did you live here or were
10 you visiting or something else?

11 A. I was visiting.

12 Q. How long were you visiting for?

13 A. I come and visit off and on. It
14 wasn't no how long I been here for; I come, I
15 go, I come, I go. I had a girlfriend over
16 here.

17 Q. And who were you visiting in New
18 York City?

19 A. My girlfriend.

20 Q. Your girlfriend, okay.

21 Where were you staying when you
22 were visiting?

23 A. Oh, at her house.

24 Q. And where was that?

25 A. That was in Far Rockaway.

1 M. Heggs

2 Q. Do you have any other types of
3 education?

4 A. No.

5 Q. Do you have a job at the facility
6 that you're currently at?

7 A. No, I'm not working.

8 Q. What was your last employment?

9 A. I don't remember.

10 Q. What's the last type of employment
11 that you did?

12 A. I think I was like fifteen; I was
13 catering or something.

14 Q. Do you know anyone who works for
15 the NYPD?

16 A. Do I know anyone?

17 No.

18 Q. Do you have any family members or
19 friends who work for the NYPD?

20 A. That would be the same thing, no.

21 Q. Mr. Heggs, do you have any
22 disabilities?

23 A. Yes, I do.

24 Q. What is your disability?

25 A. I've got an L3 spinal injury,

1 M. Heggs

2 gunshot wound to the spine.

3 Q. Any other disabilities?

4 A. Well, that's -- that's it, that's
5 the whole thing (inaudible.)

6 (Reporter clarification.)

7 THE WITNESS: I said that's it, I
8 don't have no other disabilities, no.

9 BY MS. KRUK:

10 Q. Have you ever been told by a doctor
11 that you're disabled?

12 A. Yes.

13 Q. What's the name of the doctor who
14 told you you were disabled?

15 A. I don't remember his name.

16 Q. When did the doctor tell you you
17 are disabled?

18 A. In 1995.

19 Q. Now, when I saw you earlier today,
20 before the technology or the video went down,
21 I saw you were seated in a wheelchair; is
22 that correct?

23 A. That's correct.

24 Q. Do you use any other mobility
25 assistive devices?

1 M. Heggs

2 A. Yes, I got -- I got devices that I
3 wear on my legs that -- I have severe
4 footdrop. One is called a KFO [sic] and
5 one's called an AFO.

6 Q. Sorry, one is called -- I missed
7 that; I'm sorry, I didn't hear.

8 A. A KFO and one is an AFO.

9 Q. KFO and AFO?

10 A. Yes, that's the name of it.

11 Q. And do those stand for something?

12 A. I have no idea; I believe so
13 though.

14 Q. What's the difference between the
15 two?

16 A. One is shorter than the other one.
17 One I have to have -- I have to lock it in
18 order to get stability. And the other is
19 short, so it's keeping my -- my [feet] up, in
20 the position where it doesn't drag.

21 Q. Okay. And are you wearing the leg
22 braces today?

23 A. Actually, I'm not wearing them
24 today.

25 Q. And why aren't you wearing them

1 M. Heggs

2 A. Yes.

3 Q. All right. So you were arrested on
4 or about April 30, 2015; is that right?

5 A. Yes.

6 Q. And what were you arrested for?

7 MR. RANKIN: What were you
8 charged with.

9 A. I was charged with manslaughter in
10 the second.

11 Q. So the night of April 30, or
12 that -- now, I'm going to refer, I think --
13 the accident took place around what time, or
14 the crash?

15 A. I don't recall.

16 Q. Was it at nighttime?

17 A. Yeah, it was nighttime.

18 Q. Okay. And you were in your
19 vehicle, driving, before the crash, correct?

20 A. Yes.

21 Q. Where were you going?

22 MR. RANKIN: Objection. We're
23 not going to get into the stuff around
24 what was preceding the crash. I'm
25 going to assert his Fifth Amendment

1 M. Heggs

2 who were escorting you?

3 A. Right.

4 Q. And is it true you weren't wearing
5 them, the leg braces, because you were being
6 escorted or taken out of the hospital in a
7 wheelchair; is that correct?

8 A. Say it again?

9 Q. You were not wearing the leg braces
10 because you were being escorted in a
11 wheelchair; is that correct?

12 A. I was not wearing them because I
13 was escorted in a wheelchair?

14 No, that's not correct. They
15 didn't never gave them to me.

16 Q. Did you ask for your leg braces?

17 A. Did I ask for them?

18 They had them with them, but they
19 told me I can't get them because it got metal
20 with it. It got metal, I can't get them
21 right now they said.

22 Q. Mr. Heggs, can you repeat that?

23 I'm -- I did not hear --

24 A. They wouldn't let me have them
25 because they had metal in them or something,

1 M. Heggs

2 so they wasn't giving them to you.

3 Q. They weren't giving them to you
4 because -- for what reason?

5 A. They said they had metal, they had
6 metal in them.

7 Q. They did not give them to you
8 because the leg braces had metal parts on
9 them?

10 A. Right.

11 Q. So you were escorted in a
12 wheelchair out of the hospital.

13 Then what happened when you got
14 outside of the hospital?

15 A. When I got outside the hospital --
16 I'm escorted with a nurse and with the
17 officers, and then they said I gotta go into
18 the squad car and then they picked me up and
19 put me in a squad car --

20 Q. Okay.

21 A. -- took the wheelchair back.

22 Q. And when you said they took the
23 wheelchair back --

24 (Simultaneous speaking and
25 reporter interjection.)

1 M. Heggs

2 Q. Did you have handcuffs on you when
3 you were in the car?

4 A. Yes, I did.

5 Q. And were you cuffed in the front or
6 the back or something else?

7 A. I don't really remember. I
8 probably was cuffed in the front, though,
9 maybe.

10 Q. When you were being escorted out of
11 the hospital in the wheelchair, were you
12 handcuffed?

13 A. Yes, in the front. Yeah, I was
14 cuffed in the front, yeah.

15 Q. And were you cuffed with one set of
16 cuffs or more than one set of cuffs, if you
17 remember?

18 A. I don't remember.

19 Q. So what happened when you arrived
20 at the precinct?

21 A. When I arrived at the precinct they
22 just wanted to get me out of the car, so then
23 one of them suggests they get like a chair
24 that had wheels on it, and they put me in the
25 chair and they rolled me into the precinct.

1 M. Heggs

2 Q. So they put you in a chair that had
3 wheels; is that correct?

4 A. Yeah.

5 Q. And was this a wheelchair or
6 something else?

7 A. I chair that has wheels, not a
8 wheelchair.

9 Q. And is this a chair that does not
10 have arm handles?

11 A. It's like an office desk chair that
12 spins around and got wheels on it.

13 Q. I see. I understand. So an office
14 chair that has wheels; is that correct?

15 A. Yeah --

16 Q. Okay.

17 A. -- that's correct.

18 Q. And when did they put you in that
19 chair? Was it after you got inside of the
20 precinct or, you know, when you got out of
21 the car, the police car?

22 A. They had to bring it to the car.

23 Q. Okay. And did you sit in that
24 chair with wheels?

25 A. Yeah, I sat in the chair with

1 M. Heggs

2 wheels. They held me and they pushed me into
3 the precinct.

4 Q. Okay. And then what happened next?

5 A. And then they took my property,
6 whatever, and then they rolled me into a
7 cell.

8 Q. What property did they take?

9 A. I guess my wallet, whatever else I
10 had, money, whatever.

11 Q. Did they take anything else?

12 A. That's it.

13 My phone.

14 Q. And did they complete a property
15 form, if you know?

16 A. Yeah, they did that.

17 Q. And were you given any -- a piece
18 of paper as a result?

19 A. Actually, I wasn't. They stole my
20 money too. I had \$600, they took it.

21 Q. Did you just say that the police
22 officers stole your money?

23 A. Yes, they did, they took my money.

24 Q. So you said they took your
25 property.

1 M. Heggs

2 Q. You can answer, Mr. Heggs.

3 A. Because I wanted to. It was my
4 money. I can have whatever money I want to
5 have in my pocket.

6 Q. You didn't have a job at that time,
7 correct?

8 MR. RANKIN: Objection, there's
9 no lost wage claim here.

10 Q. You can -- you can answer the
11 question, Mr. Heggs.

12 Did you have a job at that time?

13 A. No, I didn't.

14 Q. So after the police officers --
15 they took your -- your property, as
16 mentioned, what did they do with your leg
17 braces at that time, if you know?

18 A. They held onto them.

19 Q. Do you know where they put them?

20 A. No, I don't.

21 Q. So after you were placed in the
22 cell, what happened next?

23 A. They rolled me to the cell, set
24 me -- I sat on -- they put me on a bench, and
25 I just stayed on the bench the whole time.

1 M. Heggs

2 Then they came back to get me, take
3 a picture -- put me back in the chair again
4 and rolled me back out there, took my
5 picture, took my prints, and they rolled me
6 back in the cell again.

7 Q. And you said they rolled you in
8 the -- on the chair into your cell, and then
9 they took you off the chair and you sat on
10 the bench; is that correct?

11 A. Yeah.

12 Q. And after they sat you on the
13 bench, did they take the chair out of the
14 cell or did they leave the chair in there or
15 something else?

16 A. They took it with them.

17 Q. Okay. And then they brought the
18 chair back in and sat you on it and brought
19 you out and took your photo; is that correct?

20 A. Right.

21 Q. Okay. What happened next?

22 A. I went back to the cell again.

23 Q. All right. And did they again take
24 the chair, so you sat on the bench; is that
25 right?

1 M. Heggs

2 A. That is right.

3 Q. Okay. And then what happened next?

4 A. I stayed in the cell, went to sleep
5 on the bench, laid on the floor.

6 Q. Did you sleep on the bench and on
7 the floor or something else?

8 A. I was on the bench, but the space
9 was so small you can't really lay on the
10 bench, so I laid on the floor.

11 Q. All right. And how long were you
12 in the cell?

13 A. I believe I was in there for two
14 days.

15 Q. And were -- did you sleep on the
16 floor?

17 A. I just said that.

18 Q. Well, I wanted to confirm. You
19 said you laid on the floor because the bench
20 was -- wasn't very big, so I wanted to
21 confirm that you did in fact sleep on the
22 floor; is that correct?

23 A. That is correct.

24 Q. Was there anyone else in the cell
25 with you?

1 M. Heggs

2 A. A few people.

3 Q. And were those two people with you
4 the entire time that you were --

5 A. I said a few, a few. A few people,
6 not two people.

7 Q. Oh, a few people.

8 More than two?

9 A. More than two.

10 Q. More than five?

11 A. I didn't count them.

12 Q. Were there more than ten?

13 A. I didn't count them.

14 Q. So a reminder, Mr. Heggs, if you
15 don't know the answer, you can say "I don't
16 know." If you don't remember the answer,
17 then you can say "I don't remember," okay?

18 Mr. Heggs?

19 A. I heard you.

20 Q. Okay. So what happened next?

21 At some point, did they remove you
22 from the cell?

23 A. Yeah, eventually, yeah.

24 Q. And what happened? Tell me about
25 it.

1 M. Heggs

2 A. They moved me out of the cell, and
3 they had to call like an ambulette or
4 something. An ambulette came and -- before
5 that, my family came and they brung my
6 wheelchair, brought me some different
7 sneakers because they said I couldn't have my
8 sneakers or something, and a change of
9 clothes or something.

10 So we get that -- and then I got my
11 sneakers, my pants and my wheelchair, and
12 then they sent me -- they call it an
13 ambulette. An ambulette came and they sent
14 me to central booking[s].

15 Q. Now, did you say your family came
16 with a change of clothes and some sneakers;
17 is that right?

18 A. Right.

19 Q. And did you say they also came with
20 a wheelchair?

21 A. Yeah, they brung me a wheelchair.
22 They had -- I made a phone call.

23 Q. And were you allowed to use that
24 wheelchair?

25 A. Yes. It was my wheelchair.

1 M. Heggs

2 A. I don't really remember all the
3 stuff, but I know we got there, we had to
4 wait or something like that, and then they
5 rode me in and then they took my pictures
6 over there again. Take my pictures over
7 there, had my fingerprints over there again,
8 and then I was put into a cell like a long
9 time after -- after that.

10 They had to find somewhere to put
11 me or something like that, and then in the
12 cell they gave me -- they gave my leg braces
13 then but it still was in the bag, and then I
14 was handcuffed to like a rail of the cell.

15 Q. Okay. So they took you out of the
16 ambulette and you -- and wheeled you into
17 central booking using your wheelchair; is
18 that right?

19 A. Yeah.

20 Q. Okay. And then you say you were
21 placed in a cell at central booking; is that
22 right?

23 A. That's right.

24 Q. And when you were placed in the
25 cell, were you still in your wheelchair?

1 M. Heggs

2 A. Yeah.

3 Q. Yes?

4 A. Yes.

5 Q. Okay. And did they remove your
6 handcuffs once you were in the cell?

7 A. They removed one arm and handcuffed
8 another arm to a rail or something.

9 Q. And that's while you -- while you
10 were inside the cell, you still had one
11 handcuff on; is that right?

12 A. Right.

13 Q. And then when you were in the cell,
14 did you say that you were given your leg
15 braces that had been in a bag?

16 A. Yeah, they -- they -- yeah, they
17 basically like put them right there on the
18 bench or something.

19 Q. And did you put the leg braces on
20 at that point?

21 A. No, I didn't.

22 Q. And is that because you were -- you
23 were able to use the wheelchair?

24 A. Right.

25 Q. Okay. At any point in time while

1 M. Heggs

2 you were at the precinct or central booking,

3 did you go to the bathroom?

4 A. At central bookings?

5 Q. At the precinct or at central

6 booking.

7 A. Oh, at the precinct they gave me a

8 milk carton to use. And then at central

9 bookings, first I was placed in one cell and

10 handcuffed, and then I guess an officer seen

11 it and asked them why was I handcuffed in a

12 cell. They moved me -- and I was in a cell

13 with other people. They moved me to another

14 cell by myself and I took the handcuffs off.

15 Q. And at that point, were you able to

16 use the bathroom?

17 A. Yeah, at that point I was able

18 to -- they gave -- go to like to the bathroom

19 like to -- to urinate. I was able to roll

20 over there and just urinate --

21 Q. And to confirm --

22 A. (Simultaneously speaking.)

23 Q. -- did you urinate in -- it was in

24 a toilet or urinal --

25 A. At central bookings it was in a

1 M. Heggs

2 toilet. At the precinct it was in a milk
3 carton.

4 Q. Okay. And at central booking, was
5 the toilet inside a cell or was it --

6 A. (Simultaneously speaking.)

7 (Reporter interjection.)

8 THE WITNESS: Inside the cell,
9 inside the cell.

10 BY MS. KRUK:

11 Q. Okay. And did you need to stand in
12 order to urinate in the cell at central
13 booking?

14 A. No. No, I didn't.

15 Q. So to confirm, you were seated in
16 your wheelchair and were able to urinate from
17 that position?

18 A. Right.

19 Q. Okay. And did you urinate once or
20 more than once at central booking?

21 A. I don't recall how many times I
22 urinated.

23 Q. Okay. So let's go back.

24 You said when you were at the
25 precinct you were given a milk carton when

1 M. Heggs

2 you needed to urinate; is that correct?

3 A. Right.

4 Q. So tell me how that came about.

5 Did you ask the officers for access
6 to a toilet or did you tell them "I need to
7 use the bathroom" or something else?

8 A. I said I gotta use the bathroom.
9 They told me all (inaudible) was occupied or
10 something.

11 (Reporter clarification.)

12 BY MS. KRUK:

13 Q. Sorry, Mr. Heggs, could you please
14 raise your voice? The court reporter and
15 myself are struggling to hear you.

16 A. I asked if I could use the bathroom
17 and they gave me a milk carton.

18 Q. Who did you ask?

19 A. Officer.

20 Q. A male officer?

21 A. I believe so.

22 Q. Was it the same -- was it one of
23 the officers who had escorted you from the
24 hospital or someone else?

25 A. Someone else.

1 M. Heggs

2 Q. And do you know the officer's name
3 who gave you the milk carton?

4 A. No, I don't.

5 Q. Do you know his rank?

6 A. No, I don't.

7 Q. Was that Officer Bernhardt?

8 A. I don't know his name.

9 Q. Okay. Did you use the milk carton?

10 A. Yes, I did.

11 Q. And after -- and did you urinate in
12 the milk carton?

13 A. Yes, I did.

14 Q. And what did you do with the milk
15 carton after you urinated in it?

16 A. I left it right there on the floor.

17 Q. And did someone come and get the
18 milk carton or do something with it?

19 A. I don't remember nobody coming to
20 get that.

21 Q. Was there anyone else in the cell
22 when you used the milk carton?

23 A. There was like two people in there
24 at this time because they had took some other
25 people out to go to central bookings and they

1 M. Heggs

2 had left -- there was like three of us

3 left --

4 Q. Okay.

5 A. -- so there was like two people
6 left.

7 Q. And did the people who remained in
8 the cell at this time -- did they see you
9 urinate in the milk carton?

10 A. I mean, you have to see me, right?

11 Well, actually, I didn't -- I just
12 took my jacket, though -- I didn't expose
13 myself like that. I took my jacket, put it
14 over my lap and peed in the -- the carton.

15 Q. So just to confirm, so in order to
16 hide or maintain privacy over your --

17 A. Out of respect I did that, yeah --

18 Q. Right.

19 A. -- I did that out of respect for
20 people in the cell, right.

21 Q. And did you need to urinate more
22 than once while you were at the precinct?

23 A. I believe so.

24 Q. And what happened on the second
25 time you needed to urinate?

1 M. Heggs

2 A. Well, once they brung me -- there's
3 a whole bunch of milk cartons laying around
4 anyway, so it wasn't hard to get another one.
5 So it was right there, empty ones right there
6 on the floor, empty ones right there on the
7 bench. You just use another one.

8 Q. Did an officer give you a second
9 milk carton or did you just use a milk carton
10 that was in the -- in the cell or something
11 else?

12 A. An officer gave me another one
13 because it was lunchtime, so I always had one
14 available anyway.

15 Q. And did you urinate the second time
16 into a milk carton?

17 A. Yes, I did.

18 Q. And did you put your jacket over
19 your lap on that occasion as well?

20 A. I don't know if I -- I think I was
21 in there by myself at this point.

22 Q. I see. Okay. So you didn't feel
23 the need to put a jacket over your lap in
24 order to urinate because there was no one in
25 your cell to -- to witness what you were

1 M. Heggs

2 doing; is that right?

3 A. Uh-huh, yeah, you right.

4 Q. Did you have any bowel movements
5 while you were in the NYPD's custody?

6 A. No, I didn't.

7 Q. Did you need to or feel the urge to
8 make a bowel movement during your time in
9 the --

10 A. I don't remember.

11 Q. -- in NYPD custody?

12 Okay. The second time you used a
13 milk carton to urinate, was it the same
14 officer or a different officer who provided
15 you the milk carton?

16 A. Different one.

17 Q. Was it a male or a female officer?

18 A. I believe it was a male.

19 Q. And was it one of the same officers
20 who had escorted you from the hospital, if
21 you remember?

22 A. No, it wasn't.

23 Q. Did you talk to any officers about
24 your need to use a restroom?

25 A. Of course I did.

1 M. Heggs

2 Q. So what did you say to them in
3 particular, to the extent that you remember?

4 A. I just was like, this is crazy,
5 they got me peeing in a milk carton.

6 And they were just like, I know,
7 we're just not designed for wheelchairs, this
8 place is packed right now, blah-blah-blah.

9 I don't know what they -- they
10 didn't give me no real reason, nothing like
11 that.

12 Q. Did they say anything else?

13 A. Not that I remember.

14 Q. Do you know the names of anyone
15 that you were held in the cell with either --

16 A. No, I don't.

17 Q. Okay. I was going to say either at
18 central booking or at the precinct?

19 A. No.

20 Q. Who's Police Officer Robert
21 Bernhardt?

22 A. I don't know who that is.

23 Q. When you were in the cell at the
24 precinct and central booking, did anyone make
25 any threats towards you?

1 M. Heggs

2 A. Say it again?

3 Q. Did anyone threaten you when you
4 were in the cell at central booking or at the
5 precinct?

6 A. Nah, nobody threatened me.

7 Q. Okay. Did you see any fights
8 during your time in the NYPD's custody?

9 A. I mean, there was a potential
10 fight, but the officers broke it up.

11 Q. So you said that there were milk
12 cartons in the cell.

13 How would you describe the
14 conditions in the cell that you were held in
15 at the precinct and at central booking?

16 A. Comparing the two?

17 Q. Let's start with the cell at the
18 police precinct.

19 How would you describe the
20 conditions?

21 A. Conditions is horrible. It's
22 filthy, there are rodents running around, it
23 stinks, toilet ain't been cleaned, no running
24 water. Disgusting.

25 Q. You said there was no running

1 M. Heggs

2 A. I don't remember.

3 Q. Okay. Did you call anyone else
4 while you were in the NYPD's custody?

5 A. Nope.

6 Q. Did you ask Ms. Shields to call
7 anyone?

8 A. No.

9 Q. Did you -- did you ever get your
10 wheelchair that had been in the trunk of your
11 vehicle back?

12 A. No, I didn't.

13 Q. When you went to central booking,
14 were you remanded?

15 A. Yes, I was.

16 Q. And tell me about that and whether
17 you kept your wheelchair or used some other
18 assistive device --

19 A. Say what?

20 (Simultaneous speaking.)

21 Q. -- happened?

22 When you were remanded, what
23 happened to you? Tell me about it.

24 A. When I was remanded, they sent me
25 upstairs somewhere. I had the wheelchair

1 M. Heggs

2 now, at this time, so they had to call for
3 transportation. So the bus that was coming
4 was not wheelchair accessible. So I was in
5 central bookings, I think, for two days,
6 waiting for accessible, I guess,
7 transportation.

8 And then one officer says like,
9 listen, man, you're gonna be here for a long
10 time, man, you might as well just get on this
11 bus that's gonna come and then we'll help you
12 get onto the bus.

13 So at that point I was fed up as
14 well, and they carried me up to the -- up the
15 bus steps and then they put me in a chair,
16 and they folded my chair up and they brung me
17 to Rikers Island.

18 Q. Did you have your leg braces at
19 this time?

20 A. I didn't -- I didn't have my leg
21 braces. I had them but I didn't have them.
22 I still -- they weren't in my possession
23 still.

24 Q. You had the leg braces but they
25 were in a bag, they weren't on your legs; is

1 M. Heggs

2 whole ordeal. They wouldn't give me my
3 braces. I asked them about them and they're
4 not telling me why -- because -- because they
5 got metal in them.

6 And then me being in a cell with
7 other individuals who doesn't have
8 disabilities, who's walking around, it's like
9 I'm vulnerable, like they can do anything to
10 me at any second.

11 And the fact I had to urinate in
12 a -- in a milk carton, I had to cover myself,
13 looking stupid.

14 Q. Anything else?

15 A. It's the way we been treated in
16 there, it's the way they treat you, period.

17 Q. Was that the first time you've been
18 arrested?

19 A. No, it's not.

20 Q. How many times have you been
21 arrested?

22 A. (Inaudible.)

23 (Reporter clarification.)

24 THE WITNESS: I said numerous
25 [of] times.

1 M. Heggs

2 Correction has only two wheelchair accessible
3 vehicles; is that correct?

4 A. That is correct, and it's also from
5 my knowledge, from me being on Rikers Island
6 for three-and-a-half years. It's seeing
7 these vehicles, it's seeing how the
8 transportation works, that's it as well.

9 Q. Did anyone from the NYPD -- strike
10 that.

11 Do you know how many accessible
12 vehicles the NYPD has access to?

13 A. I have no idea.

14 Q. When you say --

15 A. Well, I'll say -- huh?

16 Q. Sorry, I didn't --

17 (Simultaneous speaking.)

18 A. I'll say none, if they gotta get an
19 ambulette, so I don't know.

20 Q. You guessed my next question.

21 The ambulette, just to confirm, was
22 not an NYPD van, it was more of an ambulance;
23 is that correct?

24 A. It was more of a -- yeah, like an
25 ambulette, like a Hunter van, like a -- yeah,

1 M. Heggs

2 like a van -- a person who drives you to the
3 medical trips, stuff like that, a person like
4 that that was -- that transports us to
5 central bookings.

6 Q. Was there a wheelchair lift in
7 order to get into the ambulette?

8 A. That is correct.

9 Q. Did you -- when you were at central
10 booking, did you complain to anyone about
11 their treatment of you?

12 A. At central bookings?

13 Q. Yes.

14 A. Complained to who, about central
15 bookings treatment or police treatment?

16 Q. Yes.

17 A. Which one you referring to?

18 Q. I'm referring to central booking.

19 A. Did I complain about the treatment
20 I received at central bookings?

21 Q. Correct.

22 A. It was better than the precinct. I
23 didn't really have no problem with central
24 bookings. Once the officer said why is he
25 handcuffed and he unhandcuffed me and I was

1 M. Heggs

2 Q. How far can you walk with the
3 assistance of your leg braces?

4 A. It depends, it depends on how my
5 mood is, my pain. Sometimes I have to stop
6 and go, sometimes it's a knife -- like right
7 now it's cold, right? So I got nerve damage,
8 all that, and cold affects me, so I won't
9 even be able to move around as much. But if
10 it's a nice, warm day, the sun is out, I can
11 move better.

12 Q. Mr. Heggs, does it depend on your
13 mood, whether or not you use your leg braces?

14 A. Oh, definitely, yeah. I got severe
15 nerve damages, I'm paraplegic. Without my
16 braces I cannot walk at all, so -- so there's
17 definitely that.

18 Q. What's the farthest you've walked
19 with your leg braces?

20 A. What you mean, in my life?

21 Q. Yes.

22 A. Well, when I was younger I could
23 walk like in the -- in the park --

24 Q. I'm sorry, Mr. Heggs, could you
25 raise your voice, please?

1 M. Heggs

2 A. I said when I was younger I used
3 walk in the park, like around in the --
4 around the -- the park area. As long as I'm
5 holding onto my wheelchair, I could walk all
6 the way around it.

7 Q. Can you climb up and down stairs
8 when you use your leg braces?

9 A. Yeah, it -- it's more upper
10 strength for me, so as long as I'm holding
11 onto the rails, I can -- I can maneuver up
12 and down the steps.

13 Q. Without your leg braces, can you
14 stand unassisted?

15 A. No, I cannot, no.

16 Q. Without your leg braces, if you're
17 holding onto a railing or something else, can
18 you stand?

19 A. No.

20 Q. Just one moment, I'm just going to
21 look at my notes.

22 Mr. Heggs, have you written any
23 letters to friends or family about the
24 allegations that you're making in this
25 complaint?